

# CHARGE SHEET

## I. PERSONAL DATA

1. NAME OF ACCUSED (Last, First, MI) [REDACTED]		2. EDIPI [REDACTED]	3. RANK/RATE LCpl	4. PAY GRADE E-3
5. UNIT OR ORGANIZATION [REDACTED]			6. CURRENT SERVICE	
			a. INITIAL DATE 22 Jun 15	b. TERM 4 yrs
7. PAY PER MONTH			8. NATURE OF RESTRAINT OF ACCUSED	
a. BASIC	b. SEA/FOREIGN DUTY	c. TOTAL	None	
\$2,052.30	None	\$2,052.30		
			9. DATE(S) IMPOSED N/A	

## II. CHARGES AND SPECIFICATIONS

### 10. CHARGE I: VIOLATION OF THE UCMJ, ARTICLE 80

**Specification 1:** In that [REDACTED] U.S. Marine Corps, on active duty, did, at or near Okinawa, Japan, on 6 May 2017, attempt to commit a lewd act upon [REDACTED] a person who the said [REDACTED] believed to be a child who had not attained the age of 16 years, by intentionally communicating to [REDACTED] indecent language via communication technology through the web application Chatous, to wit: "baby I'm a little horny," "I liked the [picture] with you in your panties :P that was really cute," "lol you should take off that shirt," and "can I see your butt," or words to that effect.

**Specification 2:** In that [REDACTED] U.S. Marine Corps, on active duty, did, at or near Marine Corps Base Camp Pendleton, California, on 17 September 2017, attempt to commit a lewd act upon [REDACTED] a person who the said [REDACTED] believed to be a child who had not attained the age of 16 years, by intentionally communicating to [REDACTED] indecent language via communication technology through the web application Chatous, to wit: "gonna sound weird, got a boner," "you can always just stand [there] with your mouth open and ill 'accidentally' walk into you," or words to that effect.

**Specification 3:** In that [REDACTED] U.S. Marine Corps, on active duty, did, at or near Marine Corps Base Camp Pendleton, California, on 15 December 2017, attempt to commit a lewd act upon [REDACTED] a person who the said [REDACTED] believed to be a child who had not attained the age of 16 years, by intentionally communicating to [REDACTED] indecent language via communication technology through the web application Chatous, to wit: "I've gone line 2 hours before and the girl had to take a break," "and then we went two more," and "Ooh damn girli need someone like you in my life," in reference to sexual intercourse, or words to that effect.

(Continued on Supplemental Charge Sheet)

## III. PREFERRAL

11a. NAME OF ACCUSER (Last, First, MI) [REDACTED]	b. GRADE E-3	c. ORGANIZATION OF ACCUSER [REDACTED]
d. SIGNATURE OF ACCUSER [REDACTED]		e. DATE 20 FEB 18

**AFFIDAVIT:** Before me, the undersigned, authorized by law to administer oaths in cases of this character, personally appeared the above named accuser this 20 day of FEB, 2018, and signed the foregoing charges and specifications under oath that he/she is a person subject to the Uniform Code of Military Justice and that he/she either has personal knowledge of or has investigated the matters set forth therein and that the same are true to the best of his/her knowledge and belief.

\_\_\_\_\_  
Typed Name of Officer  
  
CAPTAIN, USMC  
\_\_\_\_\_  
Signature

\_\_\_\_\_  
Organization of Officer  
\_\_\_\_\_  
Official Capacity to Administer Oaths  
(See R.C.M. 307(b)--must be commissioned officer)

12. On 20180228, 20 18, the accused was informed of the charges against him/her and of the name(s) of the accuser(s) known to me. (See R.C.M. 308(a)). (See R.C.M. 308 if notification cannot be made.)

\_\_\_\_\_  
Typed Name of Immediate Commander

\_\_\_\_\_  
Organization of Immediate Commander

FIRST LIEUTENANT, USMC

\_\_\_\_\_  
Signature

IV. RECEIPT BY SUMMARY COURT-MARTIAL CONVENING AUTHORITY

13. The sworn charges were received at 1300 hours, 26 FEB 20 18 at 3D AA BN  
Designation of Command or

\_\_\_\_\_  
Officer Exercising Summary Court-Martial Jurisdiction (See R.C.M. 403)

FOR THE<sup>1</sup> \_\_\_\_\_

\_\_\_\_\_  
Typed Name of Officer

\_\_\_\_\_  
Official Capacity of Officer Signing

FIRST LIEUTENANT, USMC

V. REFERRAL; SERVICE OF CHARGES

14a. DESIGNATION OF COMMAND OF CONVENING AUTHORITY

b. PLACE

c. DATE

\_\_\_\_\_  
MCB, Camp Pendleton, CA

20180510

Referred for trial to the General court-martial convened by GCMCO # 1-17

Dated 3, August 20 17, subject to the following instructions: None.

////////// by ////////// of //////////  
Command or Order

\_\_\_\_\_  
Typed Name of Officer

\_\_\_\_\_  
Official Capacity of Officer Signing

MAJOR GENERAL, USMC

Grade

\_\_\_\_\_  
Signature

15. On 16 May, 20 18, I (caused to be) served a copy hereof on (each of) the above named accused.

\_\_\_\_\_  
Typed Name of Trial Counsel

Captain, USMC

Grade or Rank of Trial Counsel

FOOTNOTES

1 - When an appropriate commander signs personally, inapplicable words are stricken.  
2 - See R.C.M. 601(e) concerning instructions. If none, so state.

# SUPPLEMENTAL CHARGE SHEET 1

## I. PERSONAL DATA

1. NAME OF ACCUSED (Last, First, MI)

2. EDIPI

3. RANK/RATE

4. PAY GRADE

LCpl

E-3

### CHARGE I: VIOLATION OF THE UCMJ, ARTICLE 80

**Specification 4:** In that [REDACTED] U.S. Marine Corps, on active duty, did, at or near Marine Corps Base Camp Pendleton, California, on 13 January 2016, attempt to commit a lewd act upon [REDACTED] a child who the said [REDACTED] believed had not attained the age of 16 years, by intentionally communicating to [REDACTED] indecent language via communication technology through the web application Chatous, to wit: "LOL BOOOOBSSS," "Do you love yours?," "May I see how you look like cutie?," or words to that effect.

### CHARGE II: VIOLATION OF THE UCMJ, ARTICLE 107

**Specification 1:** In that [REDACTED] U.S. Marine Corps, on active duty, did, at or near Okinawa, Japan, on or about 27 April 2017, with intent to deceive, make a false official statement, to [REDACTED] Naval Criminal Investigative Service, to wit: "I sent some pictures...nudes...like at the end of 2014... and then I stopped talking to her," or words to that effect, which was false in that [REDACTED] never sent indecent images to [REDACTED] prior to 2016, and was then known by the said [REDACTED] to be so false.

**Specification 2:** In that [REDACTED] U.S. Marine Corps, on active duty, did, at or near Marine Corps Base Camp Pendleton, California, on or about 20 July 2017, with intent to deceive, make a false official statement, to [REDACTED] Naval Criminal Investigative Service, to wit: "I have only sent naked pictures to three people before: [REDACTED], [REDACTED], and [REDACTED]" or words to that effect, which was false in that [REDACTED] did send multiple individuals indecent photos between on or about 13 December 2014 and 18 December 2017, and was then known by the said [REDACTED] to be so false. *naked pictures to people other than [REDACTED], [REDACTED], and [REDACTED]*

### CHARGE III: VIOLATION OF THE UCMJ, ARTICLE 120b

**Specification 1:** In that [REDACTED] U.S. Marine Corps, on active duty, did, at or near Okinawa, Japan, between on or about 1 November 2016 and on or about 31 January 2017, commit lewd acts upon [REDACTED] a child who had not attained the age of 16 years, by intentionally exposing, via communication technology, his genitalia to [REDACTED] to wit: sending [REDACTED] photos of his erect penis, with an intent to gratify his own sexual desire.

**Specification 2:** In that [REDACTED] U.S. Marine Corps, on active duty, did, at or near Okinawa, Japan, between on or about 1 November 2016 and on or about 31 January 2017, commit a lewd act upon [REDACTED] a child who had not attained the age of 16 years, by intentionally exposing, via communication technology, his genitalia to [REDACTED] to wit: sending [REDACTED] a video of the said [REDACTED] masturbating, with an intent to gratify his own sexual desires.

### CHARGE IV: VIOLATION OF THE UCMJ, ARTICLE 134

**Specification 1:** In that [REDACTED] U.S. Marine Corps, on active duty, did, at or near Marine Corps Base Camp Pendleton, California, on or about 17 September 2017, did use a facility or means of interstate commerce, to wit: the Internet, to wrongfully and knowingly attempt to persuade, induce, and entice an individual by the screenname [REDACTED], who [REDACTED] believed or had reason to believe was under the age of 18, to engage in unlawful sexual activities, to wit: attempting to exchange lewd or lascivious images, in violation of UCMJ Article 120b, an offense not capital, and under 18 USC §2422.

**Specification 2:** In that [REDACTED] U.S. Marine Corps, on active duty, did, at or near Marine Corps Base Camp Pendleton, California, on 7 May 2017, did use a facility or means of interstate commerce, to wit: the Internet to wrongfully and knowingly attempt to persuade, induce, and entice an individual by the screenname [REDACTED] who [REDACTED] believed or had reason to believe was under the age of 18, to engage in unlawful sexual activities, to wit: asking to receive sexually explicit images from the said [REDACTED] depicting the said [REDACTED] nude or partially nude, in violation of UCMJ Article 120b, an offense not capital, and under 18 USC §2422.

(END)

PLEASE FILL OUT AND RETURN TO THE  
TRIAL SERVICES OFFICE

**DO NOT STAPLE ANYTHING TO**  
**CHARGE SHEETS!!!!**  
**(TO INCLUDE THIS)**

PLEASE INFORM THE SNM OF THE  
CHARGE(S) AGAINST HIM/HER

ON THIS DATE 28 FEB, 201<sup>8</sup>8, AT 1416 HOURS, I [REDACTED],  
THE ACCUSED, HAVE BEEN INFORMED OF THE CHARGES PREFERRED  
AGAINST ME.

[REDACTED]

WITNESS PRINT

[REDACTED]

20180228

WITNESS SIGNATURE

[REDACTED]

ACCUSED PRINT

[REDACTED]

AC

20180228

**PLEASE FILL OUT AND RETURN TO THE  
MILITARY JUSTICE SECTION**

**DO NOT STAPLE ANYTHING TO  
CHARGE SHEETS!!!!  
(TO INCLUDE THIS)**

**AFTER BLOCK 14 IS SIGNED AND DATED BY  
THE COMMANDING OFFICER,  
SERVE A COPY OF THE REFERRED  
CHARGE SHEET TO THE ACCUSED.**

I                      CERTIFY THAT ON  
(Accused)

20180516 I HAVE RECEIVED A COPY OF MY CHARGE SHEET  
(Date)

REFERRING ME TO TRIAL BY SUMMARY - SPECIAL - GENERAL COURTS -  
MARTIAL. (CIRCLE COURT TYPE)

                                      
WITNESS PRINT

                      
ACCUS

20180516